

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

Bitseller Expert Limited, and
Accuracy Consulting Ltd.,

Plaintiffs,

v.

VeriSign, Inc. and
Does 1019,

Defendants.

Civil Action No. 1:190cv01140-AJT-JFA

DECLARATION ON BEHALF OF BITSELLER EXPERT LIMITED

I, Paul Kaydash, declare as follows:

1. My name is PAUL Kaydash. I am over the age of 18 years. I am a General Manager of Bitseller Expert Limited ("Bitseller"). I make this declaration based upon personal knowledge and my consultation with Bitseller personnel and associates. All statements contained in this declaration are true and correct to the best of my knowledge. If called as a witness, I could and would testify as to the facts set forth in this declaration.

2. Bitseller is a limited company organized in and under the laws of the Republic of Cyprus. Bitseller's principal place of business is in Riga, Latvia. Bitseller has no place of business in the United States. Bitseller has no owners in the United States.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: 11.04.2019



On behalf of Bitseller Expert Limited